

Tamara Giwa
Executive Director

Jennifer L. Brown
Attorney-in-Charge

July 7, 2025

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7/8/25

BY ECF

Honorable Mary Kay Vyskocil
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Ai Zhen Xu, 24 Cr. 15 (MKV)

Honorable Judge Vyskocil:

I write to request that the Court adjourn Mrs. Xu's Presentence Report disclosure deadlines by a period of 30 days to allow counsel sufficient time to review the Presentence Report draft with Mrs. Xu and complete a financial affidavit, with the assistance of a Shanghainese interpreter.

I recently returned from parental leave and received this case as a transfer. I learned this morning that the Presentence Report disclosure deadline is today, but Mrs. Xu has not yet had an opportunity to review the draft. I have arranged for an interpreter to assist with translation of the PSR Draft and completion of the financial affidavit at the interpreter's earliest availability, which is next Thursday, July 16. I am unable to review the PSR Draft with Mrs. Xu without the assistance of a Shanghainese interpreter. United States Probation Officer Crystalyn Meyers takes no position on an adjournment.

A 30-day adjournment would still ensure that the final Presentence Report is made available to the Court and parties well before the October 16, 2025 sentencing hearing.

Thank you for your consideration of this matter.


Respectfully submitted,

/s/
Zawadi S. Baharanyi, Esq.
(917) 612-2753

cc: AUSA Benjamin Burkett (by ECF)

Granted. SO ORDERED.

Date: July 8, 2025
New York, New York


Mary Kay Vyskocil
United States District Judge